Lehigh Acres Fire Control

And

Rescue District

Special Workshop

March 8, 2011

Response to the Major Recommendations in John Granito's, Ed.D., Report

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Fire Chief

Response to the major recommendations in John Granito's, Ed.D., report:

1. Fire pumper, quint, and aerial ladder minimum staffing should be four certified firefighters, at least one of whom should be a certified paramedic;

   The District has been meeting this objective since the award of the SAFER Grant in 2009. After the termination of the SAFER Grant this recommendation cannot be met without the addition of firefighters if we continue to provide Advanced Life Support Transport. If the District wants to continue maintaining five fire stations meeting the required staffing levels of four on an engine and two on a rescue ambulance then the total number of firefighters required would be 120, not including chief officers or administrative staff. Even at 120 firefighters there would be times that overtime would occur to fill positions.

2. Ambulance minimum staffing should be two certified emergency medical technicians, with at least one of them a certified paramedic;

   The District has been meeting this objective since the Advanced Life Support Transport system was established in 1976.

3. A carefully constructed, definitive examination of the advantages, disadvantages, operational challenges, and cost/income of Department ambulance service must precede whatever policy recommendation is made to the Board by the Department, and whatever policy decision is ultimately made by the Board. A "go-no go" recommendation is beyond the scope of this update study, but the Report's section on EMS presents some considerations. After the Chief's recommendation the Board will decide the service level;

   Over 82% of our responses are medical in nature. When a call for medical assistance is received, an ambulance staffed with paramedics is dispatched to the location, usually accompanied by a fire engine with additional personnel. All uniformed fire personnel are trained and certified Emergency Medical Technicians, and many have received substantial additional medical training to earn the title of Paramedic. All of our rescue ambulances are staffed with one paramedic at all times and sometimes there are two paramedics, which provides the citizens of Lehigh Acres with an exemplary level of medical response. Our goal is to provide treatment to those in need of urgent medical care, with the goal of satisfactorily treating the presenting conditions, or transporting the patient to a point for definitive care. I support this and believe by the District providing ambulance service , we provide the highest level of pre-hospital medical care and skills which include cannulation (the ability to use a range of drugs), cardiac monitoring, tracheal intubation, needle decompression and other skills such as performing a cricothyrotomy. I also understand this level of service comes at an additional cost to the tax payers of our community.

   While funds were readily available there was no question as to the District providing this level of service; however, with limited funds can we still provide this service, keep firefighters safe on the fireground, and have adequate resourced to meet response times? There is no doubt that the District must ensure that Advanced Life Support care is available to Lehigh Acres citizens through the use of fire engines. The question is whether the District can still support rescue ambulances? If personnel costs were not a factor then the decision would be easy to support the rescue ambulances. However, including personnel cost, paramedic supplies, fuel, vehicle maintenance, and ambulance billing the rescue ambulances do not fund themselves. Ambulances charges for FY 09/10 was $2,324,991.00, and the cash receipts (money received) was $1,292,739.19. The total estimated cost to provide the service was $2,028,748.71, causing a net loss of ($736,009.52). During the SAFER Grant period with the personnel cost being provided by FEMA there was a net increase (cash received) of $976,925.13. Once the SAFER Grant expires the rescue ambulances will once again result in negative revenue when including personnel cost.

4. While the response distances to outlying areas of the District may preclude meeting the National Standard of four minutes "road time" for a first due pumper, the Department should continue to dispatch sufficient units to meet the fifteen responders within 8 minutes National Standard to working structure fires. The "two in – two out" legal requirement must be met;

The definition of "response time" depends on the perspective from which one approaches the data. Many departments use from time acknowledge to arrival on the scene (road time). On the other hand, response time is usually measured from the time a call is received by the emergency communications center (*9-1-1 call processing and dispatch*) to the arrival of the first apparatus at the scene. Part of the response is also based on seasonal trends, time of day trends, flame spread and response time. Nonetheless, in the District's data, response times were less than 5 minutes nearly 45.2% of the time and less than 8 minutes about 80.7% of the time. Nationally, average response times were generally less than 8 minutes. The overall 90th percentile, a level often cited in the industry, was less than 11 minutes. How much current response times have been impacted by industry standards and fire department goals is not clear. It is anticipated in order to meet the four minute "road time" criteria there would need to be three more fire stations (estimated $2.2 million for a total of $6.6 million), three fire apparatus/engines ($400,000 each with equipment for a total of $1.2 million) and thirty-six personnel ($70,263 times 36 for a total of $2,529,468 *[this does not include additional personnel for K-days]* plus an additional nine firefighters would be needed for K-days for at $632,367 for a total of $3,161,835). Thus, the estimated cost to improve 4 minute average response time would be $10,961,835.

5. Compliance with the requirement for a four person "Rapid Intervention Team" at working structure fires may often require the use of outside mutual aide response;

Since the latter part of 2006 through the early part of 2008 and after the award of the SAFER Grant the District has met the requirement of the four person Rapid Intervention Team (RIT). RIT is a dedicated and specially trained group of firefighters standing by to "rescue the rescuers" during an emergency. These firefighters cannot engage in interior structural; however, there is an exception to this standard (only temporarily) when "exceptional circumstances" indicate that immediate action on the part of the first-in crew is necessary to provide rescue. To qualify for this exception, the following must apply: Only one team is allowed in the hazard area, additional resources must be on the way, and at least one firefighter is to be "standing by."[1]

6. Either a Department Training Officer position needs to be established, or the Assistant Chief should be designated as Department Training Program Director, in addition to existing responsibilities;

   On February 15, 2011, the Fire Suppression Training Officer was once again funded and established. The position is 40 hours with the responsibility to respond to major incidents during and after hours as part of the Incident Command Structure and Safety Officer.

7. The Department Fire Marshal position should be assigned the rank of Assistant chief;

   This change was discussed during the interview process with Dr. Granito as part of my vision for the District in the years to come.

8. The Department needs a position created as Operations Chief/second in command, and responsible for oversight of the Battalion Chiefs, Company Lieutenants, and response crews;

   This position has been created since 2007 and prior to the layoff was established and filled. However, with the limited funded available my decision is that this position is and will be placed on hold until the funding is available.

9. An appropriately trained on-scene Safety Officer is needed on each shift, or on immediate call, as called for in the Department's goal #1 for 10/2012;

   Safety Officer is part of the job description of the Fire Suppression Officer.

10. The Fire Marshal and the Assistant Chief for Administration should have shared responsibility for a Department public information and education program;

    This recommendation was made in June 2010, after the position of Assistant Chief for Administration/EMS was established. Currently, without any Assistant Chief this recommendation is currently being handled by the Life Safety Management Division.

11. An appropriate program should be established to reduce the annual number of false alarms, averaging 288 annually since 2005, directed by the Fire Marshal;

    This program has already been established by Life Safety Management and the function is critical to the safety and welfare of our community in terms of both actively identifying and prosecuting individuals who purposely start fires, but also in assisting in the prevention of arson activity through directing at risk youth to intervention programs such as the Juvenile Firesetter Intervention Program. The research and data gathered demonstrates trends of fire and arson activity and identifies segments of the population who are at-risk for fire related injury and death and youth who are at risk of fire setting activities. As a result there has been a decrease in false alarms.

12. National professional qualifications as listed by NFPA should be applied appropriately to all Department non-civilian positions,

    Standard for Fire Fighter Professional Qualifications identifies the minimum job performance requirements for fire fighters whose duties are primarily structural in nature. The qualifications are minimum requirements for Competencies for First Responder at the Operational Level for Responders to Hazardous Materials Incidents. Certification into officer positions by the State is generally with NFPA considerations.

13. A minimum of six shift personnel per station is necessary for adequate, safe fire suppression capability and capacity. That number also is necessary to conduct EMS "First Responder" level service with or without ambulance transport capability; and

    Due to the current available funding this recommendation cannot be met. The cost of providing six shift personnel per station would be an additional $1,264,7231.62 (salary and benefits only), respectfully.

14. If a significant financial shortfall is anticipated beginning in September 2012, taxpayer approval should be sought for a special fire-EMS service fee, or other income source. If no additional income or funding can be identified, then a scenario similar to that used before the SAFER grant seems inevitable.

The District could establish a Fire Assessment Fee (non-ad valorem or non-value) for each parcel of property in the District based on each parcel's classification and the total number of billing units attributable to that parcel with voter approval. The fire assessment would be divided by the total number of assessment units (ERUs) within the District resulting in an assessment per ERU. However, that money could only be used for fire protection and would not cover any EMS related cost. An EMS assessment fees would have to be created and used separately from the Fire Assessment Fee revenue. This could be in the form of a *Municipal Services Taxing Unit* (MSTU) where revenue is derived by ad valorem taxes. The millage rate is determined by allocating the cost of the service among the taxable value of all property within the unit. Nonetheless, the current ad valorem taxing structure could be used and reduce the millage rate. The estimated cost of a special election is $160,000.

Case law: SC00-1555, City of North Lauderdale vs. SMM Properties, Inc., et al. On the whole, *emergency medical transportation services benefit people, not property.* The assessment for emergency medical services conferred a special benefit on property was arbitrary, and the assessment "has the indicia of a tax because it is proposed to support many of the general sovereign functions contemplated within the definition of a tax.[3]

South Trail Fire Control District vs. State of Florida, 272, So2d a 383, espoused that the Court held that a legislative determination of a special benefit is not conclusive if it is arbitrary, and judicial relief may be had against its enforcement, stating: The legislature may avail itself, for the purpose of such determination [of a special benefit] of any information which it deems appropriate and sufficient. But the power of the legislature in these matters is not unlimited. There is a point beyond which it cannot go, even when it is exerting the power of taxation. It cannot by its fiat make a special benefit to sustain a special assessment where there is no such special benefit.[3]

References:

United States. (2005). Occupational Safety and Health Administration. Occupational Safety and Health Standards. http://www.gpoaccess.gov/cfr/index.html

State of Washington. (2006). Washington Legislature. Washington Administrative Code. http://apps.leg.wa.gov/wac/

In the Supreme Court of Florida. (2010, February). Respondents' amended brief of the merits and in response to amicus curiae briefs. Retrieved on February 18, 2011, from http://www.floridasupremecourt.org/pub_info/summaries/briefs/00/00-1555/00-1555_ans.pdf

Overall Recommendations from Report:

Recommendation #1: Using guidance from the Chief, the Board of Commissioners should ascertain the "Capability", and "Capacity", and mutual aid status of their Department (likely extending until August 2012) and formally recognize that status.

Recommendation #2: Using guidance from the Chief, the Board of Commissioners should decide what levels of Capability and Capacity are desired to provide reasonably adequate equitable service delivery to the District, plus the list of service type options wanted, and the source of resource funding and mutual aid necessary to maintain those levels.

Recommendation #3: A performance measurement process for both Capability and Capacity should be established and applied. (See 2010-2011 Goal #3 for a reference.)

Recommendation #4: Two different solution paths need to be identified, depending on whether (A) a multi-year Federal grant will be awarded after August 2012, or (B) not awarded. Each solution path should reflect the Board's decision concerning the types and levels of protection deemed necessary for Lehigh. Solution path A should recognize an eventual loss of Federal aid. Solution path B will recognize the grant loss in August 2012 and already have arranged for special levy or other provisions for a citizen approved increase in income.

This recommendation combines both the "budget for your plan" and "plan for your budget" planning concepts. The solution path process typically is conducted using "branch" programming methods and brainstorming type discussions, with very broad group input arrangements. Citizen information, input, and plan approval is necessary.

As the decision deadline approaches, the Board will need to convert the appropriate solution path to a Solution Decision Action Plan based on the results of the broad based discussions and the then current fiscal reality. Any special funding decisions made by other municipalities in Lee and adjacent Counties may influence a Lehigh decision and voter reaction.

Recommendation #5: Minimum actual staffing for the five first-line pumpers-quint should be four firefighters. This is necessary in Lehigh, not necessarily because of the National Standard (NFPA 1710), but because the first arriving company at a Lehigh incident typically has a too long, unsafe wait for the second due company. Additionally, with fewer than four per pumper, all five pumpers would need to be dispatched to a structure fire call, assuming no available Lehigh ambulances. The practice of having Tender (tanker) operators at Stations #1 and #4 is prudent and should be encouraged.

Note that, currently, the Lehigh aerial ladder vehicle operates as a pumper and not as a ladder company. In actuality, there are thirteen structures in Lehigh 35 feet or higher, which is the ISO height requiring aerial ladder response. However, one person can raise an aerial ladder, while three or four of the already too few Lehigh firefighters are needed to raise a 28 to 35 foot long ground ladder. Aerial ladders are labor effective, and "ladder company" operations are impossible to conduct when the Quint is operating as a pumper. A long-term goal should be to have a ladder company on duty at a Lehigh station.

Apparatus currently on hand is reported as satisfactory, although the economic situation curtails the replacement program and will build toward a severe future challenge.

Recommendation #6: Using the projected budget, reformulate an apparatus replacement plan. To retain apparatus, emphasis on a rolling maintenance program and on timely repairs may necessitate the employment of a trained part-time or on-call mechanic to augment the one remaining Department mechanic.

Insurance Services Office Review (ISO)

The ISO survey of fire protection in the Lehigh District was conducted in early 2010 and reported in a 36 page document in June 2010. A "Public Protection Classification" number is assigned by ISO and typically is used by residential and commercial fire insurance companies to establish local or area premium rates. The rating is for fire suppression capability only. It does not evaluate emergency medical service programs, although fire departments with a noticeable EMS workload may have a "loss" of one shift person in the ISO count of on-duty responders. The survey covers the fire alarm and communication systems (mostly Lee County) 10%, the fire department itself (50%), and the water supply system (40%).

Classification numbers range from 1 (the best) to 10 (no recognized protection). Of the 639 Florida fire departments currently rated, 139 received a class 4 rating, as did Lehigh, for properties within five road miles of a fire station <u>and</u> within 1000 feet of a fire hydrant. Lehigh properties within 5 road miles of a fire station but beyond 1000 feet of fire hydrant are rated 8.

If the scores are equated to a 100 point scale (as in a school test), the fire alarm section scored 96/100; the water supply scored 68/100; and the fire department scored 62/100. Said another way, the fire alarm section is a class 1, the fire department is a class 4, and the water supply is a class 4. Of 639 Florida fire departments, 262 are either class 1 (9), class 2(31), class 3 (83) or class 4 (139). (160 Florida departments are rated class 5, the statistically mean score.)

Of most importance to this Report are those areas where the Lehigh Department lost significant points, but which could be raised over the mid-term future. These areas are:

1. Use of "automatic mutual aid" to raise the number of first line pumpers to 6 (p18) (Lehigh Fire District lost 4 points out of 10).
2. "Response of a ladder or service company to all building fires" (p21). (You don't get full pumper <u>and</u> full aerial ladder credit for the same quint). (Lehigh lost 3 points out of 5). This <u>can</u> be improved.
3. "Number of stations " lost more than half the possible 4 points, but there is nothing that can be done at this time to improve this.
4. "Number of Responders" lost 5 points from a possible 15, but this cannot be improved at this time.
5. "Training" lost 4 points out of a possible 9, and <u>can</u> be improved at this time.

Recommendation #7: Review the list of equipment required by ISO for "service company" apparatus (no aerial required). Consult with ISO, and so equip an existing vehicle (tender?) and dispatch it to building fires. Possible gain of 3 points.

Recommendation #8: Accelerate and strengthen the existing effort to improve "Training" by assigning the Assistant Chief as Training Director, or by creating an additional position as full time Training Officer. Form an internal task force consisting of the Field Trainers, a Battalion Chief, the Assistant Chief, and the Fire Marshal to review the total ISO review of training and to design and implement a complete annual training package. Incorporate the 2010-2011 goals

related to officer and firefighter training. (Possible gain of 3 to 3.5 points) Note that the 2007 Report section on "training" (p14) is still valid and useful.

If the Fire Department's total credits of 30.59 could be increased by a total of 4 to 4.5 credits (34 to 35 total credits), the total credit for the ISO survey would be increased to 70 or more points for a District Classification of 3, rather than the current 4. ISO should be consulted if this Recommendation is considered for implementation. Obviously, any improvement in training would be of benefit to the personnel and residents, no matter the ISO rating, and a training improvement program is critical.

Organizational Structure and Personnel Position Recommendations:

The following recommendations are based on an analysis of the current structure and the existing position descriptions.

Recommendation #9: As soon as possible, perhaps using surplus funds, the department should recreate a position of "Operations Chief/Second in Command", with the Battalion Chiefs and responder shifts reporting to that position, through the station/shift chain of command. This position would have a dotted line relationship to the Assistant Chief for administration and EMS, and to the Fire Marshal. In the absence of the Chief, the Operations Chief would have overall responsibility for the Department. Using the existing Lehigh rank structure, this position probably would be ranked as "Deputy Chief". Regular duties would also would include District hazard analysis survey, resultant pre-planning, post-incident critiques, input for the training program, and updating the ISO rating.

Recommendation #10: The position title of "Fire Marshal" should be assigned the rank of Assistant Chief (for Prevention and Life Safety Management) and report to the Fire Chief.

Recommendation #11 The Assistant Chief for Administration and the Fire Marshal (Assistant Chief) should share the responsibility for a public safety education and information program.

Recommendation #12: Adjustments are recommended for two support positions. The EMS billing clerk should report jointly to the Finance Officer and the Assistant Chief for EMS. The position title and ranking structure for the existing position which has responsibility for payroll, human resource functions, etc. should be recognized as Administrative Assistant.

Recommendation #13: NFPA Professional Qualification Standards for firefighters, fire officers (at four levels), Fire Instructors (at three levels), and for other specialty uniformed positions should be written into the various position requirements and descriptions, with adequate time allowed for incumbents to achieve the desired level of certification.

Recommendation #14: A comprehensive incident pre-planning program should be designed and initiated (Operations Chief), likely encompassing an initial attack plan for target hazards plus an NFPA compliant standard Pre-Plan. This would assist ISO ranking as well.

Recommendation #15: In accord with the above recommendations, the following structure chart modifications are recommended:

1. Reporting directly to the Fire Chief:
    a. Deputy chief for Operations (Fire)
    b. Fire Marshal Assistant Chief
    c. Assistant Chief for Administration and EMS
    d. Finance Manager
2. Reporting directly to the Deputy Chief:
    a. Battalion Chiefs
3. Reporting directly to the Assistant Chief for Administration:
    a. Administrative Assistant (H.R.)
    b. EMS billing clerk
    c. Field Trainers

Dotted line cooperative working relationship should exist between:

1. Finance Manager and EMS billing clerk
2. Two Assistant Chiefs (for public information)
3. Operations Chief and Assistant Chief EMS and training program (if no separate Training Officer)
4. Administrative Assistant and Ops Chief and Fire Marshal
5. Medical Director and Assistant Chief EMS
6. Attorney and Fire Chief plus Board of Commissioners

Emergency Medical Services

The emergency medical service program for Lehigh Acres is based in the Lehigh Fire Department and provides first responder advanced life support from paramedic level engine companies, and advanced life support transport from paramedic level ambulances. It is one of the two fire-rescue districts in Lee County with a fire based ambulance program, and has used ambulances for almost four decades. When Fire Department ambulances are all in use, a Lee County EMS paramedic level ambulance will come into the District to handle the call. On infrequent occasions, a LAFD ambulance will provide requested response to close-by, out-of-district areas.

Note that the LAFD ambulances are dispatched by the Lee County dispatch center, and do not take non-emergency runs. These typically are termed "inter-facility" (IF) calls, and are handled by County ambulances or a private ambulance company. Note, also, that Lee County EMS and LAFD bill Medicare, insurance companies, and individuals for transport services to help offset their operational costs. The County does bill for both its emergency and inter-facility transport services.

Using September 2010 as a sample, Lee County ambulances conducted 59 IF transfers in/from the Lehigh District, plus 17 emergency transports, and 21 responses which were cancelled prior to arrival, plus one helicopter call, for a total of 98 calls, of which they likely billed for 60 to 86 of the 98. Of those particular 98 calls, LAFD ambulances actually transported and billed for 10 runs.

Between April 1, 2010 and August 31, 2010, Lee County did 268 interfacility transports in/from the Lehigh District, plus 396 emergency-type transports which could not be handled by the busy or blacked out-of-service LAFD ambulances. Thus the County likely billed Medicare,

insurance, or individuals for a total of 664 Lehigh ambulance transports over a five month period in 2010.

During 2010, from January 1 to December 6, the LAFD ambulances transported to a hospital 4,108 patients—of the 6,188 total calls they answered (75%). (Note that, of the remaining calls, 51 were DOA and 1,438 refused to go to a hospital.) Hospital transports (ALS and some at BLS level) during that time period were:

Number	Destination
5	Cape Coral Hospital
1006	Gulf Coast Hospital
263	Lee Memorial Hospital
343	Lee Health Park
2478	Lehigh Regional Medical Center
5	SW Florida Regional Medical Center

The total calls were caused by:

Traffic accident	22.4%
Sick person	13.0%
Breathing problem	9.7%
Chest pain	8.6%
Fall victim	5.7%
All Other Causes*	40.6%

*Range from abdominal pain to poisoning to gunshot to childbirth.

The typical EMS call in Lehigh receives the quickest possible response from the nearest fire apparatus, with ALS (paramedic) capability if needed, assuming that there has been no pre-decision that only an available ambulance is necessary. Depending on how many ambulances are in-service that day at Lehigh stations, the fire truck may arrive much sooner than the ambulance. The typical action sequence upon arrival is "survey the patient, stabilize, and package for transport, if needed." The issue, then, of ambulance availability is very important. A run to any hospital requires time, of course, and distant hospitals require longer times. Even earlier, the complexity of survey and pre-hospital treatment at the scene adds time. Thus the nature of the call and the hospital location are key "unit availability" factors—as well as how many ambulances are in service that day.

In May 2010, the Lehigh Board was presented an ambulance cost document prepared from Department financial documents. A copy is attached to this report and is a very useful document for Board consideration. It indicates, for example, that one ambulance in-service costs $123,411 annually, in excess of the billing income of $448,206, assuming that the total personnel costs of $167,163 are included in ambulance costs. If the Board should decide that it desires a Department capability and capacity for fire suppression and ALS/BLS "First Responder EMS service delivery, but no transport capability, (as described earlier in this Report), then the responders currently assigned to ambulance duty would be reassigned under one of several possible deployment plans. In essence, if the responders are needed anyway, their cost won't be eliminated if the ambulance is removed from service, but that ambulance's "income" of $448,206 would disappear. In a budget sense, it costs the Department $123,411 annually to have one ambulance on-duty 24/7, with two certified responders. Note that those responders, also certified as firefighters, raise the total capability and capacity of the Department, as well as

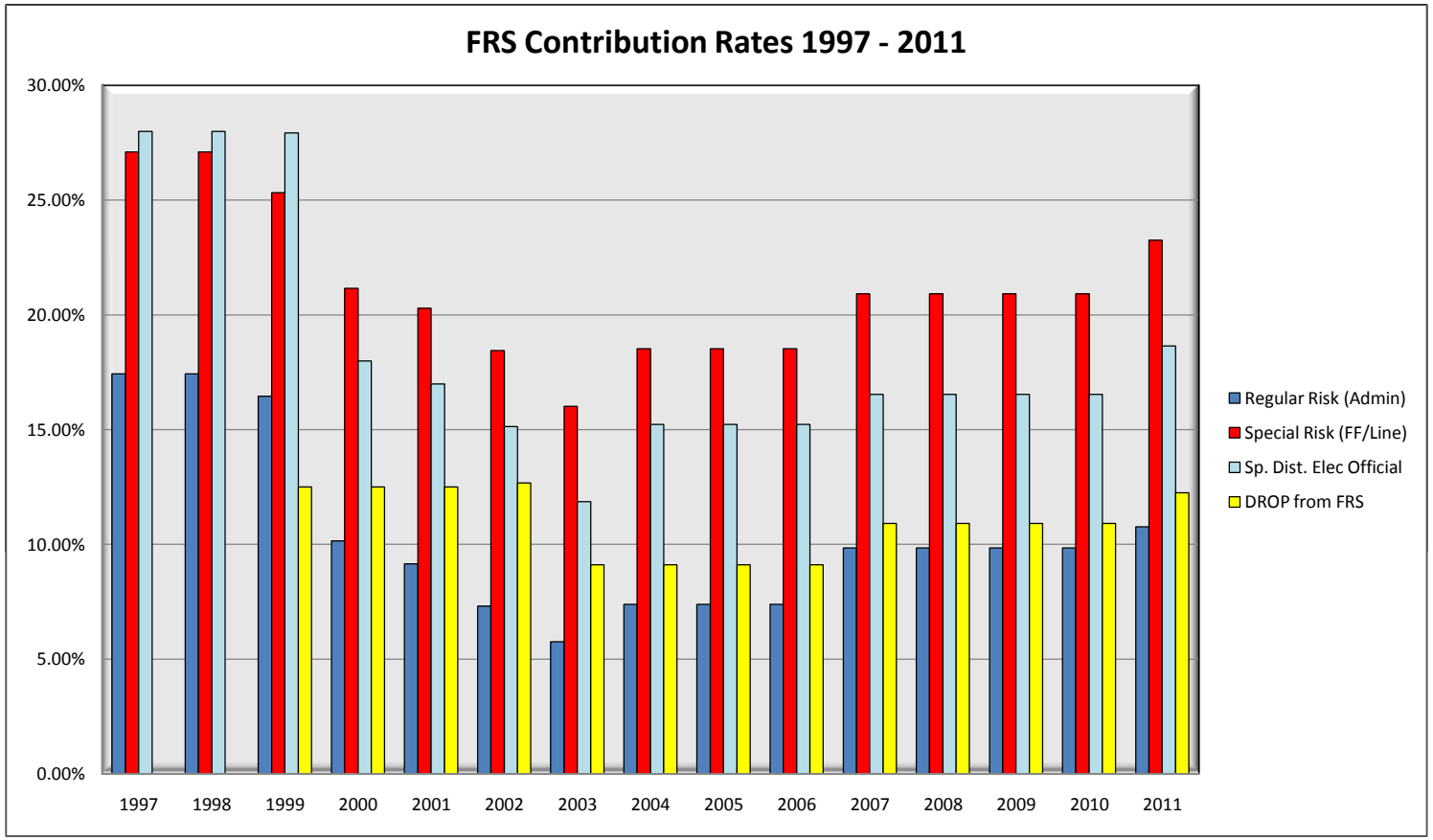
providing a level of medical response service significantly beyond what the County probably could provide the District.

Recommendation #16: Retain a minimum of six fire suppression/first EMS responders in each station, plus a duty Battalion Chief, and make every effort possible to retain ambulance transport for the District.

As officials of the District consider the questions relating to how many active LAFD ambulances (0 to 5) should be in-service at this time and in any future time absent a SAFER grant, the following are sub-issues:

1. The Lee County property tax levy includes a non-specified pro-rata amount for County EMS service. County ambulances provide any needed "mutual aid" to the LAFD Emergency Medical System. Lehigh property owners pay a County property tax.
2. Lehigh District tax levy includes the non-offset cost of LAFD ambulance service.
3. Were there no LAFD ambulance service, the LAFD reported that the County has estimated that it would service the District's area and population with fewer than two ambulances. The County EMS does contract with several fire-rescue districts which then provide ALS level "First Responder" service, with fire vehicles, as does LAFD at this time.
4. Currently, not every Lehigh fire station maintains an active ambulance.
5. The Lehigh District's ad valorum tax rate of 3% is capped. An increase would require a referendum, as would any EMS special levy.
6. The geographic size and population distribution of the Lehigh District make equity of ambulance service a challenge.
7. It appears that public knowledge concerning the important details of EMS in Lehigh may be very low, yet the public's degree of desire concerning it may well be needed very soon.
8. An EMS public information and education program for Lehigh residents is needed, in preparation for any future Board decisions.

FRS Contribution Rates	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011
Regular Risk (Admin)	17.43%	17.43%	16.45%	10.15%	9.15%	7.30%	5.76%	7.39%	7.39%	7.39%	9.85%	9.85%	9.85%	9.85%	10.77%
Special Risk (FF/Line)	27.10%	27.10%	25.32%	21.16%	20.29%	18.44%	16.01%	18.53%	18.53%	18.53%	20.92%	20.92%	20.92%	20.92%	23.25%
Sp. Dist. Elec Official	27.99%	27.99%	27.93%	17.99%	16.99%	15.14%	11.86%	15.23%	15.23%	15.23%	16.53%	16.53%	16.53%	16.53%	18.64%
DROP from FRS	0.00%	0.00%	12.50%	12.50%	12.50%	12.67%	9.11%	9.11%	9.11%	9.11%	10.91%	10.91%	10.91%	10.91%	12.25%



Additional Document: The 2011 News Press Market Watch Report for Lee County can be obtained by contacting the Ft Myers News Press directly.